

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA**

THOMAS LUCA JR., individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

WYNDHAM HOTEL GROUP, LLC, and  
WYNDHAM HOTELS AND RESORTS, LLC,

Defendants.

Case No. 2:16-cv-00746 (MRH)

**SECOND JOINT MOTION FOR EXTENSION OF  
DISCOVERY AND CASE MANAGEMENT DEADLINES**

COME NOW, Plaintiff and Defendants (collectively the “Parties”), by and through their undersigned counsel, and hereby stipulate and agree to a ninety (90) day extension to the current discovery and case management deadlines:

1. To date, the Parties have exchanged initial disclosures, interrogatories and document requests. The Parties also have served responses to those interrogatories and document requests and are actively engaged in document production.

2. Currently pending before the Court is Plaintiff’s motion to compel discovery regarding certain categories of documents and information.

3. The Parties require an extension to the current case management deadlines in order to complete discovery.

4. During the extension, the Parties anticipate, among other things, exchanging documents and relevant information, and deposing relevant witnesses.

5. This is the second request for extension of the discovery and case management deadlines.

WHEREFORE, the Parties respectfully request that the Court enter the attached proposed order extending the discovery and case management deadlines by ninety (90) days.

Dated: 12/6/2017

Respectfully submitted,

/s/ Gary F. Lynch

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Respectfully submitted,

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